

Hon. Robert J. Bryan

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

LAWRENCE HARTFORD; DOUGLAS
MITCHELL; BRETT BASS; SPORTING
SYSTEMS VANCOUVER, INC.; SECOND
AMENDMENT FOUNDATION; AND
FIREARMS POLICY COALITION, INC.,

Plaintiffs,

v.

BOB FERGUSON, in his official capacity as
Washington State Attorney General; JOHN R.
BATISTE, in his official capacity as Chief of the
Washington State Patrol; JOHN GESE, in his
official capacity as Sheriff for Kitsap County,
Washington; CLAYTON MYERS, in his official
capacity as Sheriff for Kittitas County,
Washington; JOHN HORCH, in his official
capacity as Sheriff for Clark County,
Washington; ADAM FORTNOY, in his official
capacity as Sheriff for Snohomish County,
Washington; CHAD M. ENRIGHT, in his
official capacity as County Prosecutor for Kitsap
County, Washington; GREG ZEMPEL, in his
official capacity as County Prosecutor for
Kittitas County, Washington; TONY GOLIK,
in his official capacity as County Prosecutor for
Clark County, Washington; and JASON
CUMMINGS, in his official capacity as County
Prosecutor for Snohomish County, Washington,

Defendants.

No. 3:23-cv-05364-RJB

DECLARATION OF
LAWRENCE HARTFORD
IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION

1 I, Lawrence Hartford, declare as follows:

2 1. I make this declaration in support of my Motion for Preliminary Injunction. I am
3 over the age of 18, have personal knowledge of the matters stated herein and, if called upon, I could
4 and would competently testify thereto.

5 2. I am a member of both member of Second Amendment Foundation and Firearms
6 Policy Coalition, Inc.

7 3. I want to acquire a BCM M4 Mod 2, which is an AR-type firearm.

8 4. If it were legal in the state of Washington to acquire a BCM M4 Mod 2, I would do
9 so.

10 5. But for the recently enacted ban on transfer of any BCM M4 Mod 2, I would acquire
11 one.

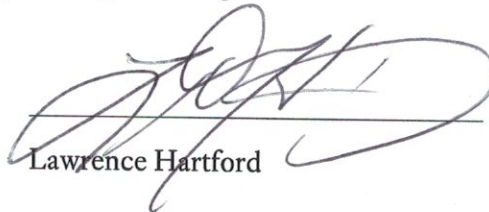
12 6. However, because I fear prosecution by Defendants if I did acquire a BCM M4 Mod
13 2, I cannot do so while the ban remains in force.

14 7. I am also unaware of any licensed, law-abiding dealer who would sell me a BCM M4
15 Mod 2, because such sales have been made illegal and a civil violation of the Washington Consumer
16 Protection Act.

17 8. I am prepared to testify to the foregoing at trial of this matter.
18 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of the laws of the United States
19 that the foregoing is true and correct.

20 Signed this 4th day of May, 2023, at Kitsap County, Washington.

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Lawrence Hartford